

11 October 2023

Ms Emily Briggs
Project Sponsor
Deputy Director General
Climate and Sustainability
Department of Water and Environmental Regulation
Government of Western Australia

Dear Ms Briggs

Response to National End-of-life Tyres Options Project 2023– Working Paper

Thank you for the opportunity to respond to the Government of Western Australia, Department of Water and Environmental Regulation's National End-of-Life Tyres Options Project: Preliminary drafts of problem, objectives and principles for jurisdictional review working paper.

The Motor Trades Association of Australia (MTAA), as the national automotive industry body, represents the unified voice of Australia's automotive industry, identifying and monitoring issues affecting all sectors, informing and advising Government on relevant industry impacts, trends, and proactively participating in the development of sound public policy on issues affecting the retail motor trades, the Australian vehicle fleet and the mobility of our local communities.

MTAA is well versed in issues relating to end-of-life vehicle (ELV) considerations, having recently completed a joint project with the Federal Chamber of Automotive Industries (FCAI), which modelled for a comprehensive ELV stewardship scheme for Australia, including waste tyres.

In response to the above, MTAA broadly supports the set of principles outlined in the working paper and further supports the introduction of a mandated, co-regulated Tyre Product Stewardship Scheme (TPSS) under the *Recycling and Waste Reduction Act 2020* (Cth). It is expected this will drive industry participation and increase onshore consumption and recovery of all end-of-life tyres (EoLT).

In anticipation of a mandated, co-regulated scheme, it is important to consider existing product stewardship schemes already in operation across the automotive industry, including how these schemes could interact, co-ordinate or integrate with the introduction of a new TPSS. This would increase alignment, efficiencies and reduce a duplication of efforts.

Existing schemes include, but are not limited to:

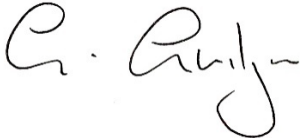
- Aluminum Stewardship Initiative
- Product Stewardship for Oil Program
- Tyre Product Stewardship Scheme
- Responsible Steel
- Battery Stewardship

Finally, MTAA acknowledges that the disposal of waste tyres in Australia is a complex issue. Options for not only the collection of waste tyres (of all varieties, including motorcycle, commercial and recreational tyres), but also their repurposing, need to be well thought through, including careful consideration as to the infrastructure investment required to support these efforts. The challenge will be increasing the perceived value of EoLT to encourage re-use, re-treading and recycling. Currently, there is little incentive for tyre retailers in regional Australia and Off the Road tyre consumers to avoid contributing to landfill.

Recent statistics indicate approximately 129,200 tonnes of tyres were sent to landfill in Australia¹. Establishing policy guidelines that will assist in reducing the tonnage of tyres going into landfill will be beneficial for the industry and Australia's environment. However, any new initiatives should be done with consideration to minimising any additional cost or administrative burden to small business operators.

We welcome the opportunity to engage with you further on this issue and make ourselves available for future consultation as the project advances.

Yours sincerely



Geoff Gwilym
CEO
MTAA

¹ Tyre Stewardship Australia. (2022). "Australia tyre consumption and recovery." Fact sheet.
<https://www.tyrestewardship.org.au/wp-content/uploads/2022/03/TSA-Tyre-Consumption-Recovery.pdf>
